

Peter J. Viteznik, OSB No. 944540

pviteznik@kilmerlaw.com

Robert B. Miller, OSB No. 960068

bobmiller@kilmerlaw.com

KILMER, VOORHEES & LAURICK, P.C.

732 N.W. 19th Avenue

Portland, Oregon 97209-1302

Telephone: (503) 224-0055

Fax: (503) 222-5290

Attorneys for Defendants

Terrance Thurber, Thomas Thurber,

DG Rollins Mining, LLC and

Columbia Gorge Data Center, LLC

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION

RAYMOND BALL, an individual;
and JOSEPH TOTH, an individual,

Plaintiffs,

vs.

MATTHEW CARSON, an individual;
WILLIAM CARSON, an individual;
TERRANCE THURBER, an individual;
THOMAS THURBER, an individual;
DG ROLLINS MINING, LLC, a Wyoming
limited liability company;
COLUMBIA GORGE DATA CENTER, LLC,
a Nevada limited liability company;
WHC & SWC INVESTMENTS, LTD,
a Texas limited partnership;
INTELLIGENT INVESTMENTS, LLC,
a Texas limited liability company; and
SNICKERS #1, LLC,
a Texas limited liability company,

Defendants.

Case No. 3:19-cv-00242-HZ

**UNOPPOSED MOTION FOR
EXTENSION OF TIME FOR
DEFENDANTS TERRANCE THURBER,
THOMAS THURBER, DG ROLLINS
MINING, LLC, AND COLUMBIA
GORGE DATA CENTER, LLC TO
RESPOND TO COMPLAINT**

LR 7-1 CERTIFICATION

Under Local Rule 7-1, counsel for Plaintiffs and Defendants Terrance Thurber, Thomas Thurber, DG Rollins Mining, LLC, and Columbia Gorge Data Center, LLC have conferred and agreed regarding this unopposed motion.

MOTION

Pursuant to Fed. R. Civ. P. 6(b), Defendants request that the time for them to answer or otherwise respond to Plaintiffs' Complaint be extended by seven days from June 21, 2019 to June 28, 2019.

The requested seven-day extension is necessary to allow Defendants and their counsel sufficient time to complete their review of documents to more fully respond to the allegations in the Complaint. This request is not made for the purpose of delay.

CONCLUSION

WHEREFORE, Defendants respectfully move this Court for a seven-day extension of time in which to respond to Plaintiffs' Complaint from June 21, 2019 to June 28, 2019.

DATED this 19th day of June, 2019.

KILMER VOORHEES & LAURICK, P.C.

/s/ Peter J. Viteznik

Peter J. Viteznik, OSB No. 944540

pviteznik@kilmerlaw.com

Robert B. Miller, OSB No. 960068

bobmiller@kilmerlaw.com

Attorneys for Defendants Terrance Thurber,
Thomas Thurber, DG Rollins Mining, LLC
and Columbia Gorge Data Center, LLC

I:\10546\0003\Pleadings - USDC Oregon\MOET file answer 2019-0619.docx